, Holland + Knight

Tel 202 955 3000 Fax 202 955 5564 Holland & Knight LLP 2099 Pennsylvania Avenue, N.W., Suite 100 Washington, D.C. 20006 www.hklaw.com



Courtney S. Kamlet 202 457 7036 courtney.kamlet@hklaw.com

May 15, 2006

### BY HAND DELIVERY

Office of International Corporate Finance Division of Corporation Finance Securities and Exchange Commission 100 F. Street, N.E. Washington, D.C. 20549-0302

PROCESSED
MAY 1 7 2006
THOMSON

THUMSUN

SUPPL

JW5/15

Re:

Japan Tobacco Inc. (File No. 82-4362) Information Furnished Pursuant to

Rule 12g3-2 under the Securities Exchange Act of 1934

#### Ladies and Gentlemen:

We are counsel to Japan Tobacco Inc., a corporation incorporated under the laws of Japan (the "Company"), in connection with this filing made pursuant to the exemption provided under Rule 12g3-2 (the "Rule") promulgated under the Securities Exchange Act of 1934, as amended (the "Exchange Act").

Attached as an Annex to this letter is a list of information, certain items of which are enclosed herewith, that the Company has made public pursuant to the laws of Japan, has filed with stock exchanges or has distributed to its security holders, subsequent to the information furnished under cover of the letter, dated May 25, 2004, from Mori Hamada & Matsumoto to the Securities and Exchange Commission (the "Commission"), and subsequent to the information previously furnished to the Commission by this firm on behalf of the Company.

The information set forth herein is being furnished to the Commission pursuant to subparagraph (b)(1)(iii) of the Rule. In accordance with subparagraphs (b)(4) and (b)(5) of the Rule, the information and documents furnished herewith are being, and any information or documents furnished in the future by the Company pursuant to the Rule will be, furnished with the understanding that they shall not be deemed "filed" with the Commission or otherwise subject to Section 18 of the Exchange Act, and that neither this letter nor the furnishing of any such information or documents pursuant to the Rule shall constitute an admission for any purpose that the Company is subject to the Exchange Act.

Securities and Exchange Commission May 15, 2006 Page 2

•

If you have any questions regarding this filing, please do not hesitate to call me at (202) 457-7036 or, in my absence, Neal N. Beaton of the New York office at (212) 513-3470 or Lance D. Myers of the New York office at (212) 513-3217. We would appreciate it if you would date stamp the enclosed copy of this letter and return it to our waiting messenger.

Very truly yours,

Courtney S. Kamlet

Holland & Knight LLP

Courtney & Kamlet

# 3785278\_v1



## INFORMATION DISTRIBUTED

15APAGESE LANGUAGE DOCUMENTS

Object description of Japanese language documents listed below is set out in EXHIBIT A hereto)

For this time, Japan Tobacco Inc. has no Japanese language document or material for submission to the U.S. Securities Exchange Commission pursuant to Rule 12g3-2.

# B. ENGLISH LANGUAGE DOCUMENTS (English documents listed below are included in EXHIBIT B hereto)

### 1. Press Releases

	<u>Date</u>	<u>Title</u>
1)	05/11/2006	JT Announces Its New Medium Term Management Plan
	(05/11/2006)	"JT2008"
2)	05/11/2006	JT Applies to Raise Retail Prices of Domestic Tobacco
	(05/11/2006)	Products in Response to an Impending Tax Increase

Note: The dates in parentheses are the dates of the releases in Japanese

# **EXHIBIT A**

# BRIEF DESCRIPTION OF JAPANESE LANGUAGE DOCUMENTS

Not Applicable.

